

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
REGINA TOLLIVER	:	VIOLATIONS:
	:	18 U.S.C. § 1344 (bank fraud - 1 count)
	:	18 U.S.C. § 1028A (aggravated identity theft - 7 counts)
	:	18 U.S.C. § 1030 (computer fraud - 1 count)
	:	18 U.S.C. § 2 (aiding & abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Citizens Bank was a financial institution conducting business in the Eastern District of Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation.
2. Defendant REGINA TOLLIVER was a sales service representative with Citizens Bank with computer access to account information for customers of Citizens Bank.
3. From on or about February 1, 2007 to on or about November 19, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody and control of

Citizens Bank by means of materially false and fraudulent pretenses, representations and promises.

THE SCHEME

It was part of the scheme that:

4. Defendant REGINA TOLLIVER used her position as a sales service representative at a King of Prussia, Pennsylvania branch of Citizens Bank to improperly access computerized account information for customers of Citizens bank. She then provided account numbers and other account information to persons unknown to the grand jury who used that stolen account information to manufacture false photographic identification documents and fraudulent checks, and who then provided those false identification documents, account numbers and fraudulent checks to “check runners,” persons unknown to the grand jury who cashed and attempted to cash fraudulent checks on, and made or attempted to make fraudulent withdrawals from, those Citizens Bank accounts.

5. From on or about February 1, 2007 and on or about November 19, 2007, defendant REGINA TOLLIVER used her position with Citizens Bank to improperly acquire account information for Citizens Bank accounts belonging to S.R.M., M.R., W.G. L.P., V.T., S.M., and E.B. Defendant TOLLIVER then gave that account information, including account numbers, to persons unknown to the grand jury who used the account information to acquire and attempt to acquire approximately \$193,593 from Citizens Bank by withdrawing money from, attempting to withdraw money from, cashing counterfeit checks on, and attempting

to cash counterfeit checks on, accounts belonging to S.R.M., M.R., L.P., W.G., V.T., S.M., and E.B.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and on or about March 2, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of S.R.M., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and on or about March 1, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of M.R., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and or about March 2, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of L.P., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and on or about April 3, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of V.T., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and on or about April 11, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of W.G., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and on or about May 18, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of S.M., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and on or about November 19, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of E.B., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 1, 2007 and on or about March 15, 2007, in the Eastern District of Pennsylvania, defendant

REGINA TOLLIVER

knowingly, and without authorization and in excess of authorized access, obtained information contained in a financial record of Citizens Bank, a federally insured financial institution doing business in interstate commerce.

In violation of Title 18, United States Code, Section 1030.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 371, 1344, 1028A and 1030, set forth in this indictment, defendant

REGINA TOLLIVER

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this indictment, including, but not limited to, the sum of \$181,577.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),

incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY